

Mary C. Geddes  
Assistant Federal Defender  
FEDERAL PUBLIC DEFENDER  
FOR THE DISTRICT OF ALASKA  
601 West Fifth Avenue, Suite 800  
Anchorage, Alaska 99501  
(907) 646-3400

Attorney for Petitioner

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

JACK L. EARL, JR.,

Petitioner,

vs.

CRAIG TURNBULL,

Respondent.

Case No. 3:02-cv-0224-HRH

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO ALLOW  
FILING OF MERIT BRIEF  
(Filed on Shortened Time)**

Petitioner, Jack L. Earl, Jr., by and through counsel Mary C. Geddes, Assistant Federal Defender, moves this court for an extension of time in which to file his brief on the merits in this matter. The brief is due today; the proposed deadline will be October 19, 2006. An additional five-week extension is requested, but hopefully Mr. Earl's counsel will be able to file her brief in advance of that deadline.

During the past month, counsel switched to 4/5 time and had several unanticipated assignments, such as two petitions for rehearing, three pretrial motions and a lengthy responsive

pleading in a habeas case, which interfered with her ability to work on Mr. Earl's case. She believes she will have no such problems in the near future.

Mr. Earl agrees with the filing of this motion, and the respondent's counsel, Ken Rosenstein, has been contacted and is agreeable to the continuance.

DATED this 15<sup>th</sup> day of September, 2006.

Respectfully submitted,

FEDERAL PUBLIC DEFENDER  
FOR THE DISTRICT OF ALASKA

/s/ Mary C. Geddes  
Assistant Federal Defender  
Alaska Bar No. 8511157  
601 West 5<sup>th</sup> Avenue, Suite 800  
Anchorage, AK 99501  
Ph: (907) 646-3400  
Fax: (907) 646-3480  
[mary\\_geddes@fd.org](mailto:mary_geddes@fd.org)

Certification:

I certify that on September 15, 2006, a copy of the foregoing document was served electronically on:

Kenneth M. Rosenstein, Esq.

/s/ Mary C. Geddes